



STATE OF MAINE

DEPARTMENT OF ENVIRONMENTAL PROTECTION

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July 18, 1994

Mr. Fred Evans
Project Manager, Code 1821
Department of the Navy, Northern Division
Naval Facilities Engineering Command
10 Industrial Highway, Mailstop 82
Lester, Penn. 19112-2090

**RE: Draft Record of Decision For An Interim Remedial Action At Site 9, dated
June 1994, Brunswick Naval Air Station, Brunswick, Maine**

Dear Fred:

The Department has received and reviewed the Draft Record of Decision for an Interim Remedial Action at Site 9 for NAS, Brunswick dated June 1994. The Department's comments are provided below.

1. Page 15, ¶ 2: AWQC must be applied for Protection of Human Health and Freshwater Aquatic Life. AWQC are contaminant concentrations in surface water that are considered protective of human health and aquatic organisms.
2. Page 16, ¶ 2, first sentence: Were all wells sampled for the same analytes in all five rounds of sampling? If not, it is misleading to imply that all wells were sampled for the same analytes in all five rounds of sampling.
2. Page 17, last paragraph: It is not clear what is meant by "...NAS Brunswick and site background concentrations". Please clarify.
3. Page 18, last paragraph: Please note that only one round of sampling was conducted on MW-914, MW-915, and MW-916.
4. Page 19, ¶ 3, last sentence: Consider removing "...and are not attributed to Site 9." There is not sufficient basis for this statement.
5. Page 19, ¶ 4, first sentence: Remove this sentence. There is not sufficient evidence to rule out the former incinerator and ash disposal area as not contributing to the VOC contamination downgradient of the disposal area. There is not enough evidence to state that the PAHs and fuel-related compounds are not site related.

6. Page 26, ¶ 3: Remove all references in this paragraph and all following sections to the three alternatives that focus on remediating the septic system. These alternatives are not applicable to Site 9.

7. Page 40, Federal and State Drinking Water Regulations: Maine's Maximum Exposure Guidelines (MEGs) are enforceable standards; they are not guidelines to be considered. The MEGs are promulgated standards in Maine's Solid Waste Regulations and the Hazardous Waste Rules and should be relevant and appropriate requirements at Site 9.

Sincerely,



Nancy Beardsley
Project Manager, Federal Facilities Unit
Office of the Commissioner

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Jim Caruthers, NAS Brunswick
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